

**JOHN HENRY SCHNEIDER**

**CASE NO. 14-61357-7**

**SUMMARY OF DOCUMENTS AND MOTION FOR TURNOVER/DOCKET 30**

**Demonstrative Exhibit:**

**Summary of documents request on Motion for Turnover received and still missing as of March 4, 2015**

1. All documents supporting Debtor's Chapter 7 petition for bankruptcy relief as specified on LBF 33, due no later than 14 days prior to the §341 Meeting of Creditors, scheduled for January 23, 2015. Trustee requests additional documents and information as specified below, including but not limited to:

- a. All financial and organization documents for any and all businesses, partnerships, corporations, etc. in which Debtor maintains an interest, or has maintained an interest in the past two years, including but not limited to Articles of Organization, asset/liability statements, profit/loss statements; balance sheets, inventory, accounts receivable, and tax returns for the years 2012 and 2013. Business include but are not limited to the following:

- i. Northern Rockies Neuro-Spine, PC

- Taxes 2012, 2013

- K1 to Schneider Individ. - 2013 (100%)

- Northern Rockies Neuro-Spine (US Bank x5331) – August 1 through October 31, 2014.

- Promissory Note from Schneider Ltd for \$2.5mill with amortization agmt and security pledge 5-9-12

- Numerous boxes of files dated prior to 1/1/11

- Substantially all of deposits, copies of checks and invoices paid, payroll information for 2011, 2012 and the beginning of 2013

- Wells Fargo acct x7988 1/1/11-7/31/11; 1/31/12-5/31/12; 8/1/12-8/31/12

- ii. Northern Rockies Insurance Company;

- Statement of Work with ORG

- 2009 Annual Report

- 2011 Premium Tax Statement for Captive Insurance Companies, signed 2/29/11

- Payment request from Montana Commission of Insurance 2/15/12

- Confirmation of filing of 2012 Annual Report with Montana Secretary of State

- T.Trier resignation from Board of Managers 5/29/12

- Wells Fargo acct x2733 1/1/12-4/30/12
- Wells Fargo acct x2468 10/1/11-3/31/12; 5/1/12-6/30/12

- iii. Northern Rockies Neuro-Monitoring Medical;
  - Taxes 2010, 2011, 2012, 2013
  - K1 to Schneider Ltd – 2013 (25%)
  - Articles of Organization (NR Neuromonitoring, LLC) (Word file, not signed)
  - Operating Agreement (Word file, not signed)
  - Subscription Agreement (Word file, not signed)
  - Wells Fargo acct x6922 1/1/11-1/31/11; 3/1/11-7/31/11
- iv. ONI Ambulatory Surgery Center or Orthopaedic Neuro Institute Surgical Center, LLC (ONI and OMNI are possibly sometimes the same? Schneider seemed to refer to them interchangeably);
  - Summary of Cash Flow 4/30/12, 10/31/11
  - 12 Month Detail 12/31/12, 4/30/12, 12/31/11
  - Balance sheet 12/31/12, 4/30/12, 12/31/11
  - Cash Flow statement 12/31/12, 4/30/12
  - Comparative Detail Statement 4/30/12, 12/31/11
  - Change in Terms Agreement for ONI Realty Investors, LLC (different company? No other docs)
  - Default of WSB loan, ltr to Schneider SLP (for guarantee) dated 10/11/13 (loan to OMNI Funding Corp.
  - 10/9/13 ltr from WSB re Put Option
- v. Prime Healthcare Properties;  
NONE
- vi. Whispering Winds Ranch;  
NONE
- vii. Schneider Limited Partnership, LLC;
  - Certificate and Agreement
  - WY SoS Registration 2007
  - EIN – 26-1498675
  - Articles of Organization 12-5-07
  - Greear consent to Registered Agent 7-1-07
  - Restated Operating Agreement 11-1-11
  - John Trust assignment of half of its Schneider Ltd interest to Michelle Trust 10-25-11
  - Schneider Indiv and Michelle requests for liquidation of capital accounts 2-15-13
  - Minutes of Joint Mtg w/Schneider Mgt LLC 5-1-12
  - 2011 IRS Extension
  - 2012 taxes original and amended

- 2013 taxes original and amended
- K1 Elite Medical Holding, LLC – 2013 (12.5%)
- Ltr to Schneider SLP dated 10/11/13 re OMNI default of WSB Loan
- 10/9/13 ltr from WSB re Put Option
- Prudential Term Essential Policy with death benefit of Schneider to Schneider Ltd of \$2mill – 6/21/12
- Ltr to Northern WY Surgical Center 4-17-12 req to liquidate shares (owned my Schneider Ltd)

- Change in Terms Agreement for ONI Realty Investors, LLC
- Waiver of service for Schneider Ltd – Meridian case (unsigned)

- WY SoS UCC statement for MedPort LLC 5/1/13
- Notice of Satisfaction to NRNeuro Spine for \$2.5mill 2-15-13
- Ltr to NRNeuro Spine dated 2/11/13 confirming receipt of past-due interest of \$144,280.20, recd 2/7/13
- Ltr to NRNeuro Spine demand for pmt of \$2.5mill 1-28-13
- Promissory Note to NRNeuro Spine for \$2.5mill with amortization agmt and security pledge 5-9-12
- Promissory Note to MedPort, LLC for \$5mill with security pledge 5-1-12

viii. Schneider Management, LLC;

- EIN – 26-1498591
- Ownership Certificate Class A Member – John Trust .1% interest
- Ownership Certificate Class B Voting Member – Michelle Trust 1.0% interest
- Ownership Certificate Class B Non-Voting Member – Michelle Trust 98.9% interest
- Minutes of Joint Mtg w/Schneider Ltd 5-1-12
- Minutes of Organization Meeting 11-20-07

ix. John H. Schneider, MD, PC;

- Wells Fargo acct x2978 1/1/11-1/31/11 (closing statement)

x. Northern Rockies Management Group, Inc.;

NONE

xi. Northern Rockies Brain and Spine Center, PLLC.

NONE

- b. All documents for all parcels of real property in which Debtor maintains an interest or has maintained an interest in the past four years in any state, specifically including Montana, Wyoming, and Utah. Properties include business and personal properties and include but are not limited to 3611 Tommy

Armour Circle in Billings, Montana; 12735 Hidden Valley Trail in Molt, Montana; and Whispering Winds Ranch in Wyoming.

#### **MOLT PROPERTY**

- Warranty Deed – Schneider Indiv to Burrows 5-30-12**
- Warranty Deed– Schneider Ltd to Schneider Indiv 5-30-12**
- Warranty Deed – Schneider Indiv to Schneider Ltd 11-15-09**
- Warranty Deed – Trier to Schneider Indiv 3-16-09**

#### **WHISPERING WINDS**

- Warranty Deed – Michelle to Kid Trusts 6-8-12 (4 parcels)**
- Warranty Deed – Schneider Ltd to Michelle 6-8-12 (4 parcels)**
- Warranty Deed – Michelle to Kid Trusts 6-5-12 (2 M parcels)**
- Warranty Deed – Schneider Ltd to Michelle 6-5-12 (2 M parcels)**
- Warranty Deed – BSC, LLC to Schneider Ltd 2-4-11 (2 M parcels)**
- Warranty Deed – Barngrover to Schneider Ltd 1-19-11 (4 parcels)**
- Warranty Deed – Morrison to BSC, LLC 8-8-06 (2 M parcels)**

#### **HOMESTEAD**

- Appraisal 2012**
- Warranty Deed – John and Michelle Trusts to Brandon 6-5-12**
- Warranty Deed – Brandon to John and Michelle Indiv. 8-16-12**
- Declaration of Homestead – John and Michelle, 8-28-12**

- c. A copy of all insurance policies, including but not limited to E&O Insurance, malpractice insurance, homeowners/property insurance, vehicle insurance, etc., for all business and personal interests and property.

**-Minnesota Life insurance policy for Schneider Indiv for \$1.5mill, no beneficiary or terms noted. 2/26/12**

- d. A copy of any all bank records Debtor maintains or has access to, or has had access to in the past four years, both business and personal, for the past four years through the date of filing, including but not limited to statements, opening or closing documents, canceled checks and deposits, accounting of cash transactions. Accounts include but are not limited to business and personal bank or credit union checking and savings accounts, brokerage accounts, money market accounts, mutual fund accounts.

**-Personal account (Stockman Bank x1832) – July 17 through October 16, 2014;**

**-Northern Rockies Neuro-Spine (US Bank x5331) – August 1 through October 31, 2014. Duplicate documents were provided for this account for these dates labeled as NRIC for Northern Rockies Insurance Company but were in fact duplicates of the Northern Rockies Neuro-Spine Account;**

**-Schneider Limited Partnership (Stockman Bank x1263) – 2/4/13-4/2/13; 6/4/13-1/2/15. Missing 1/1/11-2/3/13; 4/3/13-5/2/13**

**-Northern Rockies NeuroSpine (Wells Fargo acct x7988) 1/1/11-7/31/11; 1/31/12-5/31/12; 8/1/12-8/31/12**  
**-Northern Rockies Insurance Company (Wells Fargo acct x2733) 1/1/12-4/30/12**  
**-Northern Rockies Insurance Company (Wells Fargo acct x2468) 10/1/11-3/31/12; 5/1/12-6/30/12**  
**-Northern Rockies NeuroMonitoring (Wells Fargo acct x6922) 1/1/11-1/31/11; 3/1/11-7/31/11**  
**-John Schneider MD, PC (Wells Fargo acct x2978) 1/1/11-1/31/11 (closing statement)**

**e. None received.**

Documentation of any and all transfers in the past four years, of property in which Debtor maintained a full or partial personal or business interest, including but not limited to real property, vehicles, investments, artwork, business interests, water/oil/mineral rights or leases, judgments or potential claims, inheritance, etc.

**-Warranty Deeds for Molt property, Homestead, and WWR as noted above.**

**f. None received.**

All documents regarding any and all trusts to which Debtor has or may have had a beneficial interest (contingent or vested), operates or has operated as a trustee, and/or Debtor has invested funds into for past four years. Documents requested include but are not limited to the trust documents, any modifications or amendments thereto, any dissolution of trusts or changes to trustee, all financial and bank statements for the past four years, any distributions and accountings for the past four years, any tax returns filed for the past four years, etc. Trusts include but are not limited to the following:

- i. John Schneider Revocable Trust, dated November 20, 2007;
- ii. Michelle Schneider Revocable Trust, dated November 20, 2007;
- iii. Brandon Schneider Benefit Trust dated March 30, 2012;
- iv. Shannon Schneider Benefit Trust dated March 30, 2012;
- v. Caitlin Schneider Benefit Trust, dated March 30, 2012.

**-Assignment of WF Judgment to Kid Trusts**

**-Judgment Sale Agreement**

**-Mortgage on WWR from Kid Trusts to MedPort LLC (\$650K)**

**-Promissory note from Kid Trusts to MedPort 3/19/14 (\$650K)**

**-Foreign Judgments in Park County, WY and Yellowstone County, MT**

**g. None received.**

Monthly statements for the past four years for any all investment and retirement accounts to which Debtor is currently or was previously a beneficiary or owner

thereof within the past four years. Accounts requested include but are not limited to the following:

**-DA Davidson IRA 9/1/30-9/30/14**

**-TIAA CREF IRA 7/1/14-9/30/14**

-Any and all retirement and investment accounts belonging to Michelle Schneider, Brandon Schneider, Shannon Schneider, and Caitlin Schneider.

**h. None Received.**

Any and all supporting documentation and basis for claims for the breach of contract and E&O claims as scheduled on Schedule B against Org, LLC, Brenda Olsen, and Rocky MT Medical services.

**i. Complaint and Answer and Counterclaim related to the Meridian Surgical Parnets [sic] v. Schneider as scheduled on the Statement of Financial Affairs Paragraph 4.**

**-Waiver of service for Schneider Ltd (unsigned)**

**-Various documents and information from other parties to arbitration**

**j. None received.**

All financial records, bank statements, expenditures, claim documents, tax returns, and insurance commission documents for the past four years for any and all insurance companies owned or operated by Debtor, or in which Debtor has any interest or has had any interest in the past four years, including but not limited to Northern Rockies Insurance Company.

**k. None received.**

A complete and itemized listing of “office equipment for NRNS” and “Inventory” as scheduled on Schedule B, including but not limited to applicable model or serial numbers, age, date of purchase, perfected secured interests, depreciation taken, and current market value.

**l. A copy of all titles, loan documents, loan status or payoff, registration, insurance, transfer or sale documents, and all original purchase documents any and all vehicles, business or personal, Debtor has an interest in, or has had an interest in the past four years, or which Debtor has purchased or contributed funds or credit to purchase. Vehicles include but are not limited to the following:**

i. 2001 Harley Davidson Motorcycle, VIN 1HD1BMY121Y081295;

ii. 2005 Trailer, VIN 1W9GH1627YW301348;

iii. 2006 Boat, VIN USHA88CT1506;

iv. 2006 Trailer, VIN 5KTBS23216F184618;

v. 2009 Trailer, VIN 4LAAS242X95047635;

vi. 2010 Polaris SX5, VIN 4XAZN55A0AA011963;

- vii. 2011 SHAR 6X Trailer, VIN 1S9BE0815B1870855
- viii. 2001 GMC Sienna, VIN 1GTHK29U41E302524;
- ix. 2007 GMC Savanna, VIN 1GDFS15T571158619;
- x. 2008 Trailer, VIN 4H102131180426693;
- xi. 2010 SS2 Quad, VIN L0BBTRGY6A0000171
- xii. 2010 SS2 Quad, VIN L0BBTRGY0A0000263;
- xiii. 2011 GMC Yukon, VIN 1GKS2CE07BR210515;
- xiv. 2009 Hummer, VIN 5GTEN13E698139271;
- xv. 2014 Ford Mustang GT Convertible, VIN 1ZVBP8FF7E5232570;
- xvi. 2006 Hummer, VIN 5GTDN136668251097;
- xvii. 2010 Dodge Viper, VIN 1B3AZ6EZ8AV100051; and
- xviii. 2001 Ford F150, VIN 1FTRW08L51KA90384.

**Have: copies of titles for the above-referenced vehicles. Missing: lien documentation showing perfection and release of any and all liens, documentation of any and all transfers of vehicles or other disposition thereof, proof of insurance on all vehicles, and original purchase information and documentation for the purchase of all vehicles.**

**m. None received.**

Any and all documents related to claims with Utah Medical Insurance Association (“UMIA”), specifically including but not limited to communication between UMIA, Steve Emery; the law firm of Williams, Porter, Day & Neveille; and the debtor’s captive insurance carrier, Northern Rockies Insurance Company, and any combination thereof. Documents requested include but are not limited to correspondence; electronic correspondence; notes; emails; letters; handwritten notes; transcriptions of voicemails, telephone calls or meetings; notes relating to any telephone calls or conferences; any applicable diary, journal, or calendar entries; and any other form of communication or correspondence encompassed in this request.

**-UMIA policy provided by creditor**